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Attorney for Defendant  
JOHNNIE EARL ROSS, JR.

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOHNNIE EARL ROSS, JR.,  
  
Defendant.

2:20-CR-0208-JAM

AMENDED STIPULATION AND  
~~PROPOSED~~ ORDER FOR  
DEFENDANT'S TEMPORARY  
RELEASE TO ATTEND FUNERAL

**STIPULATION**

The parties to this action, Plaintiff United States of America by and through Assistant United States Attorney David Spencer, and Defendant by and through his attorney Chris Cosca, provide this unopposed defense request for defendant's temporary release to attend his uncle's funeral. The request is for an Order granting Mr. Ross' temporary release from the Sacramento County Jail on Friday October 15, 2021, between 8:00 a.m. and 9:00 a.m., and to return to the jail no later than 7:30 p.m. Mr. Ross was very close to his Uncle Patrick Home, who recently passed away. This request is made pursuant to 18 U.S.C. § 3142(i). The death represents a significant loss for the defendant.

Mr. Ross is pending sentencing and the government does not oppose this request for an Order

1 allowing Mr. Ross to be temporarily released from the Sacramento County Jail to the custody of  
2 licensed private investigator Fred Scoville on October 15, 2021, from 8:00 a.m. to 7:30 p.m. Mr.  
3 Ross' activity will be limited to: traveling from the Sacramento County Jail to attend services at 11  
4 a.m. at Greater New Hope Baptist Church, 1467 Michael Ave, Stockton, California 95206; following  
5 the funeral service for a short parade behind a horse and carriage starting at the church and ending on  
6 Pilgrim Street; and a funeral repast at Center Stage BBQ, 2210 Country Club Blvd, Stockton,  
7 California, 95204. Investigator Fred Scoville will escort and remain with Mr. Ross at all times until  
8 his return to the Sacramento County Jail.  
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12 **IT IS SO STIPULATED.**  
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15 DATED: October 10, 2021 /s/ David Spencer  
16 DAVID SPENCER  
Assistant United States Attorney  
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18 DATED: October 10, 2021 /s/ Chris Cosca  
19 CHRIS COSCA  
Counsel for Defendant  
20 JOHNNIE EARL ROSS, JR.  
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**ORDER FOR TEMPORARY RELEASE**

Based on the representations and stipulation of the parties, and good cause appearing, the Court orders the following:

1. JOHNNIE EARL ROSS, XREF 5346147, DOB 7/21/2000, shall be released from the Sacramento County Jail for a "Temporary Out" on October 15, 2021, at 8:00 a.m., to the temporary custody of Investigator Fred Scoville, who has agreed to function as third-party custodian.

2. Upon temporary release, Mr. Ross shall remain with the third-party custodian while traveling from the Sacramento County Jail to attend: 11 a.m. services at Greater New Hope Baptist Church, 1467 Michael Ave, Stockton, California 95206; following the funeral service, a short parade behind a horse and carriage starting at the church and ending on Pilgrim Street; and a funeral repast at Center Stage BBQ, 2210 Country Club Blvd, Stockton, California, 95204.

3. Investigator Fred Scoville shall return Mr. Ross to the Sacramento County Jail by 7:30 p.m. on October 15, 2021. Investigator Scoville IS ORDERED to notify the government and Pretrial Services immediately if Mr. Ross is non-compliant with the conditions of release.

4. Defendant Ross will be subject to the terms and conditions set forth in the Amended Notice to Defendant Being Released, attached hereto as Exhibit A.

**IT IS SO ORDERED**

IT IS SO FOUND AND ORDERED this 12 day of October, 2021.

  
JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE